

**TECHNICAL REVIEW DOCUMENT**  
**for**  
**RENEWAL OF OPERATING PERMIT 95OPDE077**  
to be issued to:

Shafer Commercial Seating, Inc.  
Denver County  
Source ID 0310910

Revised June 2013

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|-------------------------------------|------------------|
| Operating Permit Engineer:          | Geoffrey Drissel |
| Operating Permit Supervisor review: | Matthew Burgett  |
| Field Services Unit review:         | Tom Lovell       |

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## **I. Purpose**

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued September 1, 1998. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted October 15, 2012, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.colorado.gov/cs/Satellite/CDPHE-AP/CBON/1251596446069>. This narrative is intended as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

## **II. Source Description**

This source is primarily classified as a commercial wood furniture manufacturing

facility under Standard Industrial Classification 2599. Ten percent (10%) of Shafer's overall manufacturing is done on site. The remaining 90% is imported from outside of the country. Their mill operation consists of various saws, sanders, etc. The finishing process requires five (5) paint spray booths for different steps in the process.

This facility is located in the Denver Metro Area. The Denver Metro Area is classified as attainment/maintenance for particulate matter less than 10 microns in diameter (PM10) and carbon monoxide (CO). Under that classification, all SIP-approved requirements for PM10 and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act. The Denver Metro Area is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.16.

This facility is categorized as a NANSR minor stationary source (Potential to Emit VOC or NOx < 100 Tons/Year). The source is also currently considered to be a minor source for purposes of Prevention of Significant Deterioration (PSD) regulations (Potential to Emit < 250 tpy). Facility-wide potential and actual emissions are as follows:

| <b><u>Pollutant</u></b> | <b><u>Potential to Emit (tpy)</u></b> | <b><u>Actual (tpy)</u></b> |
|-------------------------|---------------------------------------|----------------------------|
| VOC                     | 90.0                                  | 4.7                        |

Potential to Emit is based on the maximum allowable emissions as defined by the operating permit. Actual emissions are based on the VOC levels reported in the most recent APEN submittal. This facility is not subject to the requirements of Section 112(r) of the Clean Air Act Amendments of 1990 based upon the Potential material usage as reported in the Title V application.

### **MACT Applicability**

#### **JJ – Wood Furniture Manufacturing Operations:**

MACT JJ includes requirements that limit the emissions of hazardous air pollutants from existing and new wood furniture manufacturing operations located at major sources. Based on permitted emission limits, this facility is a major source and is subject to the requirements of this MACT. These requirements include limits on the HAP content of the materials utilized in the furniture manufacturing operations, as well as requirements that limit formaldehyde emissions from coatings and contact adhesives.

The conditions listed in the Operating Permit reflect the current rule language as of

the revision to MACT JJ published in the Federal Register on 11/21/2011. New requirements in the 11/21/11 revision include limitations on formaldehyde emissions from certain manufacturing operations. Affected sources are required to be in compliance with the new limitations no later than November 21, 2014.

### **Reg 7 Applicability**

Section IX.A.7 of Regulation No. 7 requires owner/operators of surface coating operations to minimize fugitive VOC emissions through the implementation of specific control techniques and work practices. These requirements have been incorporated into the conditions for the Shafer paint booths.

### **RACT Requirements**

RACT requirements for this source were defined by the underlying Construction Permit issued to this facility prior to the issuance of the initial Operating Permit. The applicable requirements incorporated into the Operating Permit include routine equipment replacement, employee training and good housekeeping practices.

## **III. Discussion of Modifications Made**

### **Source Requested Modifications**

The source did not request any changes to the permit in their renewal application.

### **Other Modifications**

The Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Shafer Operating Permit:

#### **Section II – Specific Permit Terms**

Requirements were added to the Paint Booth conditions that incorporate the applicable 11/21/11 amendments to MACT JJ. A condition was also added that incorporates the fugitive VOC control requirements of Regulation No. 7, Section IX.A.7.

#### **Section IV – General Conditions:**

The General Conditions section was replaced with the most current version.

The Division contact person in Appendix D was updated.

#### **IV. Greenhouse Gasses:**

The potential-to-emit of greenhouse gas (GHG) emissions from this facility is less than 100,000 TPY CO<sub>2</sub>e. Future modifications greater than 100,000 TPY CO<sub>2</sub>e may be subject to regulation (Regulation No. 3, Part A, I.B.44).